

## **REMARKS**

### **Administrative Overview**

Claims 1-54 were presented for examination. Applicant hereby cancels claims 1-19, 25 and 38-54. Applicant amends claims 20-24 and 26-37 and adds claims 55-56. Upon entry of the present amendments, claims 20-24, 26-37 and 55-56 are presented for examination, of which claim 20 is independent. No new matter has been added by the proposed claim amendments or the new claims.

Applicant respectfully requests reconsideration of all claims and withdrawal of the objections and rejections, to the extent they are maintained over the claims as amended.

### **Specification Objections**

The Specification was objected to for failing to provide support for Claim 17. Applicant respectfully disagrees with the Examiner, but nevertheless hereby cancels claim 17, mooted this objection.

### **Rejections under 35 U.S.C. § 102**

Claims 1-6, 11, 12, 15, 16, 18, 20-24, 31-47 and 51-54 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent Publication Number 2001/0047406 to Araujo et al. ("Araujo"). Applicant respectfully submits that Claims 1-6, 11, 12, 15, 16, 18, 20-24, 31-47 and 51-54 as previously presented are patentable over Araujo. However, Applicant hereby cancels claims 1-6, 11, 12, 15, 16, 18, 31-47 and 51-54, mooted this rejection with respect to those claims and amends claims 20-24 and 31-37 to more clearly recite the claimed invention. Applicant respectfully submits that amended Claims 20-24 and 31-37 are patentable over Araujo.

Anticipation requires a demonstration that the cited reference discloses each and every element of the claimed invention. Applicant respectfully submits that Araujo fails to meet this exacting standard because the Examiner admits that Araujo does not describe a "proxy server modif[ying] the data received from said application server." *See* Office Action mailed on November 4, 2008, pages 21 and 23. Moreover, Araujo fails to teach a thin-client application executing on the proxy server. It must follow, therefore, that Araujo does not disclose that a thin-client application executing on the proxy server receives application output generated by an application server and writes that data to a virtual frame buffer maintained in a memory element provided by the proxy server, as explicitly required by the independent claim 20, as amended.

Applicant respectfully submits, therefore, that the rejection of claim 20 amended, and claims 21-24 and 26-37 which depend from claim 20, as anticipated by Araujo is overcome and should be withdrawn.

**Rejections under 35 U.S.C. § 103**

Claims 7, 8, 13, 14, 19, 25, 28-30 and 48-50 were rejected under 35 U.S.C. § 103(a) as obvious over Araujo in view of U.S. Patent Publication Number 2002/0091738 to Rohrbaugh et al. ("Rohrbaugh"). Claims 7, 8, 13, 14, 19, 25 and 48-50 have been cancelled, mooted the rejection with respect to those claims. While Applicant respectfully submits that Claims 28-30 as previously presented were patentable over Araujo in view of Rohrbaugh, Claims 28-30 have been amended to more clearly recite the claimed invention. Applicant respectfully submits that Claims 28-30 which depend from claim 20, are patentable over any combination of Araujo and Rohrbaugh.

*Prima facie* obviousness is shown only when one or more references, together or alone, teach or suggest each and every element of the claimed invention. Applicant respectfully submits that Araujo and Rohrbaugh, either alone or together, fail to teach or suggest the claimed invention because neither reference teaches or suggests a thin client application executing on the proxy server that receives application output data from an application server and writes it to a virtual frame buffer maintained in a memory element of the proxy server.

The arguments made above with respect to the patentability of claim 20 over Araujo apply with equal force here and are reiterated as if set forth in full.

Rohrbaugh, like Araujo, fails to teach or suggest the claimed invention because neither reference teaches or suggests a thin client application executing on the proxy server that receives application output data from an application server and writes it to a virtual frame buffer maintained in a memory element of the proxy server. Rohrbaugh merely describes a resolution independent vector display of HTML content that can be displayed on a mobile device regardless of the screen resolution. *See* Rohrbaugh, Abstract. The mobile device receives the translated and vectorized content, processes the content and displays it on the mobile device. *See* Rohrbaugh paragraph 50; Abstract. The proxy server hosts only an HTML translator application that translates the received HTML content into a scalable vector that can be displayed on any screen. *See* Rohrbaugh paragraph 58. At best Rohrbaugh teaches only that a thin client

application can be used on the mobile device itself, in order to render output received from the proxy server.

Applicant respectfully submits therefore, that since neither Araujo nor Rohrbaugh teach or suggest a thin client application executing on the proxy server that receives application output data from an application server and writes it to a virtual frame buffer maintained in a memory element of the proxy server, the rejection of claims 28-30 as obvious over Araujo and Rohrbaugh taken alone or in combination is overcome and should be withdrawn.

### **New Claims**

New claims 55-56 depend from claim 20. Applicant submits, therefore, that new claims 55-56 are patentable for the reasons argued above in connection with claim 20.

### **Conclusion**

Applicant contends that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicant's agent would expedite prosecution of this application, the Examiner is urged to contact Applicant's agent at the telephone number identified below.

Respectfully submitted,  
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Date: March 4, 2009

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